

**FILED**



United States District Court  
Eastern District of California

OCT 16 2024

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY PMN  
DEPUTY CLERK

Laura Wylie, an individual,

Plaintiff(s)

Case Number: 2:22-cv-00604-KES-EPG

v.

Merck & Co., Inc., et al.,

Defendant(s)

APPLICATION FOR PRO HAC VICE  
AND PROPOSED ORDER

Pursuant to Local Rule 180(b)(2) of the United States District Court for the Eastern District of California,  
Raquel L. Flynn hereby applies for permission to appear and participate as  
counsel in the above entitled action on behalf of the following party or parties:  
Merck & Co., Inc.; Merck Sharp & Dohme Corp.; Organon & Co.; Organon LLC

On 12/17/2020 (date), I was admitted to practice and presently in good standing in the  
Supreme Court of Maryland (court). A certificate of good standing from that court is  
submitted in conjunction with this application. I have not been disbarred or formally censured by a court of  
record or by a state bar association; and there are not disciplinary proceedings against me.

☒ I have ☐ I have not concurrently or within the year preceding this application made a pro hac vice  
application to this court. (If you have made a pro hac vice application to this court within the last year, list  
the name and case number of each matter in which an application was made, the date of application and  
whether granted or denied.)

A pro hac vice application is being concurrently filed in a related case:

Hobbs v. Merck & Co., Inc., et al., Case No. 2:22-cv-00662-KES-EPG

Date: 10/15/2024

Signature of Applicant: /s/ Raquel L. Flynn

**Pro Hac Vice Attorney**

Applicant's Name: Raquel L. Flynn  
Law Firm Name: Venable LLP  
Address: 750 East Pratt Street, Suite 900  
  
City: Baltimore State: MD Zip: 21202  
Phone Number w/Area Code: (410) 244-7454  
City and State of Residence: Baltimore, Maryland  
Primary E-mail Address: rlflynn@venable.com  
Secondary E-mail Address: raquelbowings301@yahoo.com

I hereby designate the following member of the Bar of this Court who is registered for ECF with whom the Court and opposing counsel may readily communicate regarding the conduct of the case and upon whom electronic notice shall also be served via the Court's ECF system:

Local Counsel's Name: Susan V. Vargas  
Law Firm Name: King & Spalding LLP  
Address: 633 West Fifth Street, Suite 1600  
  
City: Los Angeles State: CA Zip: 90071  
Phone Number w/Area Code: (213) 443-4355 Bar # 177972

**ORDER**

The Pro Hac Vice Application is APPROVED. The Pro Hac Vice Attorney is DIRECTED to request filing access through PACER.

Dated: 10/16/24

  
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JUDGE, U.S. DISTRICT COURT

# Supreme Court of Maryland

Annapolis, MD



## ***CERTIFICATE OF GOOD STANDING***

STATE OF MARYLAND, ss:

I, Gregory Hilton, Clerk of the Supreme Court of Maryland, do hereby certify that on the seventeenth day of December, 2020,

***Raquel Lynn Flynn***

having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court. This certificate of good standing is valid through the thirteenth day of December, 2024.



**In Testimony Whereof**, I have hereunto set my hand as Clerk, and affixed the Seal of the Supreme Court of Maryland, this fourteenth day of October, 2024.

*Gregory Hilton*

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Clerk of the Supreme Court of Maryland